

Exhibit 4

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BBC GROUP NV LLC, a Nevada Limited)
Liability Company,)
Plaintiff,)
vs.)
ISLAND LIFE RESTAURANT GROUP LLC,)
a Washington Limited Liability Co.; ALEX)
PRINDLE, a Washington Resident; BRIAN)
O'CONNOR, a Washington Resident,)
Defendants.)
NO. 2:18-cv-01011 RSM
PLAINTIFF'S RESPONSES TO
DEFENDANT'S OCTOBER 2018
REQUESTS FOR PRODUCTION.

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and the orders of this Court, Plaintiff BBC GROUP NV LLC ("BBC") submits the following objections and responses to Defendant ISLAND LIFE RESTAURANT ("Island Life") First Set of Interrogatories ("Interrogatories"). These responses are made solely for the purpose of this action, and are subject to objections as to relevance, materiality, and admissibility.

Investigations in this matter are ongoing. Therefore, these responses and objections are based upon information that is currently known or readily ascertainable by BBC after a reasonable and diligent investigation. BBC reserves the right to amend, modify, revise, or supplement these responses as necessary.

GENERAL OBJECTIONS

1 The following general objections apply to each and every request contained in Defendants' 2 requests, including its definitions and instructions, and each of the general objections is 3 incorporated by reference into the specific objections to each request, regardless of whether the 4 specific objections overlap or repeat the general objection

5 1. Plaintiff BBC Group NV LLC ("BBC" or "BBC Group NV LLC") objects to the 6 requests to the extent that they seek documents and information subject to (a) attorney-client 7 privilege, (b) work product immunity, (c) joint defense privilege, (d) common interest privilege, 8 or (e) any other applicable privilege, immunity, or protection. BBC Group NV LLC does not intend 9 to produce such privileged or protected documents or things, and the inadvertent production of 10 such is not to be deemed a waiver of any privilege. BBC Group NV LLC expressly reserves the 11 right to object to the introduction at trial or any other use of such documents or things that may be 12 inadvertently disclosed. In addition, BBC Group NV LLC objects to the requests and all other 13 definitions and instructions to the extent they seek and/or require BBC Group NV LLC to produce 14 a privilege log for documents or things falling within the attorney-client privilege or work-product 15 doctrine, if such documents or things were created after the date that this lawsuit was filed. An 16 objection based on the attorney-client privilege and/or the work product doctrine shall not be 17 construed as a representation that such document or thing exists or existed. Such objections 18 indicate only that the requests are of such a scope as to embrace subject matter protected by the 19 attorney-client privilege, the work product doctrine, or other protection or privilege.

20 2. Any production of such documents and information, except pursuant to a written 21 agreement concerning them, is inadvertent and shall not constitute a waiver of any privilege or 22 protection.

1 3. BBC Group NV LLC objects to the requests to the extent that they seek documents,
2 information, and things (a) not relevant to the subject matter of this investigation, (b) not
3 reasonably calculated to lead to the discovery of admissible evidence, or (c) otherwise not within
4 the scope of relevant discovery.

5 4. BBC Group NV LLC objects to the requests to the extent that they seek to impose an
6 improper or undue burden on BBC Group NV LLC, or duties and responsibilities greater than
7 those imposed by the Federal Rules of Civil Procedure, and the local Rules.

8 5. BBC Group NV LLC objects to the requests to the extent that they seek to impose an
9 obligation to identify or search for documents at any location other than that at which they would
10 be expected to be stored in the ordinary course of business.

11 6. BBC Group NV LLC objects to the requests to the extent they seek documents and things
12 that do not exist or are beyond BBC Group NV LLC's possession, custody, or control.

13 7. BBC Group NV LLC objects to the requests to the extent they seek documents and things
14 that are equally or more readily available to Defendants.

16 8. BBC Group NV LLC objects to the requests to the extent that they use terms or
17 definitions that are vague, ambiguous, confusing, overbroad, unduly burdensome, or are not
18 defined or understood. BBC Group NV LLC will interpret the terms and phrases used in the
19 requests as they are reasonably understood by BBC Group NV LLC. In many instances, BBC
20 Group NV LLC will specify exactly what term is vague or causes the request to be overbroad, or
21 BBC Group NV LLC will provide a specific understanding of that term or scope of relevance for
22 the purposes of responding to a particular request. That does not mean that terms not specifically
23 addressed by BBC Group NV LLC are clear or of appropriate scope or that BBC Group NV LLC's
24 understanding of them is the same as Defendants'. Rather, in addressing specific terms, BBC
25

1 Group NV LLC is attempting to identify potential conflicts or ambiguities in terminology as early
2 as possible so that the parties may expeditiously resolve discovery disputes during the course of
3 this investigation.

4 9. BBC Group NV LLC objects to the requests to the extent they are not limited in time.

5 10. BBC Group NV LLC objects to the requests to the extent they request documents and
6 things that are subject to a claim of confidentiality from a third party.

7 11. BBC Group NV LLC objects to the requests to the extent individual requests are
8 compound, and thereby render this request unduly burdensome.

9 12. BBC Group NV LLC objects to the requests to the extent they seek documents and
10 things relating to BBC Group NV LLC's claims and defenses at this time and are thereby
11 premature. BBC Group NV LLC will respond either as required by the procedural schedule or
12 agreement of the parties, or once BBC Group NV LLC has had an adequate opportunity to fully
13 investigate based on information in the possession of, or under the control of Defendants.

14 13. BBC Group NV LLC further objects to these requests and all other definitions and
15 instructions to the extent they seek documents or things that are confidential, financial,
16 proprietary, trade secret or other confidential or sensitive business information relating to BBC
17 Group NV LLC or any third party without the relevance of such information being shown, the
18 entry of a protective order to adequately protect BBC Group NV LLC and/or third party
19 information, and/or the consent of any applicable third party.

20 14. BBC Group NV LLC objects to each request and all other definitions and instructions
21 to the extent the burden or expense of the proposed discovery outweighs its likely benefit, given
22 the needs of the case, the amount in controversy, the parties' resources, the importance of the
23

1 issues at stake in the litigation, and the importance of the proposed discovery in resolving the
2 issues.

3 15. BBC Group NV LLC objects to each request and all other definitions and instructions
4 to the extent they seek documents or things that are in the nature of a legal conclusion.

5 16. BBC Group NV LLC objects to each request and all other definitions and instructions
6 the extent they seek documents or things that are in the nature of an expert opinion.

7 17. BBC Group NV LLC has not yet completed a full investigation, collection of
8 information, discovery and analysis relating to this action. The following response is based on
9 information known and available to BBC Group NV LLC at this time. Discovery in this litigation
10 is ongoing. BBC Group NV LLC reserves the right to amend, supplement, or otherwise change its
11 response to these Requests should any additional information become available to it. BBC Group
12 NV LLC also reserves the right to produce additional evidence at trial.

13 18. BBC Group NV LLC's agreement to produce documents or things in response to
14 Defendants' Requests, shall not be deemed as an admission regarding the relevance of the
15 requested documents or things, nor is it intended to waive any right to object to the admissibility
16 of such at trial.

18 19. The General Objections apply to all of BBC Group NV LLC's Responses to
19 Defendants' Requests. To the extent that specific objections are also cited in response to specific
20 Instructions, Definitions, and Requests, those specific citations are provided because they are
21 believed to be particularly applicable to the request and are not to be construed as a waiver of any
22 other General Objections applicable to information falling within the scope of the request.

RESPONSES TO REQUESTS FOR PRODUCTION

Subject to and without waiving the foregoing General Objections, BBC responds to Island Life's Interrogatories as follows:

REQUEST FOR PRODUCTION NO. 1:

Please provide all documents regarding the setup of the “Bok Bok” restaurants including any business plans, meeting minutes, business model, and documents detailing the structure and organization of the restaurants.

RESPONSE TO INTERROGATORY NO. 1:

BBC incorporates each of the General Objections in this response as though they were set forth in full herein. BBC also further objects to this Request as vague, ambiguous, unduly burdensome and/or overbroad. BBC also further objects to this Request as the request seeks documents and things that are Confidential in nature and can only be disclosed after the entry of a protective order protecting certain documents as Attorney's Eyes Only and/or confidential.

BBC offers to meet and confer with Defendants in an attempt to resolve these objections at a mutually convenient date and time.

BBC expressly reserves the right to supplement and/or amend this response as its investigation continues and as further information becomes available.

REQUEST FOR PRODUCTION NO. 2:

Please produce documents related to any expansion plans that you may have, and as specified in Interrogatory 2.

RESPONSE TO REQUEST FOR PRODUCTION NO.2:

BBC incorporates each of the General Objections in this response as though they were set forth in full herein. BBC also further objects to this Request as vague, ambiguous, unduly burdensome and/or overbroad. BBC also further objects to this Request as the request seeks documents and things that are Confidential in nature and can only be disclosed after the entry of a protective order protecting certain documents as Attorney's Eyes Only and/or Confidential.

BBC offers to meet and confer with Defendants in an attempt to resolve these objections at a mutually convenient date and time.

BBC expressly reserves the right to supplement and/or amend this response as its investigation continues and as further information becomes available.

REQUEST FOR PRODUCTION NO. 3: Please identify any loan that BBC has secured to build and operate present and future “Bok Bok” Restaurants.

RESPONSE TO REQUEST FOR PRODUCTION NO.3:

BBC incorporates each of the General Objections in this response as though they were set forth in full herein. BBC also further objects to this Request as vague, ambiguous, unduly burdensome and/or overbroad. BBC also further objects to this Request as the request seeks documents and things that are Confidential in nature and can only be disclosed after the entry of a protective order protecting certain documents as Attorney's Eyes Only and/or confidential.

BBC offers to meet and confer with Defendants in an attempt to resolve these objections at a mutually convenient date and time.

BBC expressly reserves the right to supplement and/or amend this response as its investigation continues and as further information becomes available.

1 Subject to and without waiving the objections recited above, BBC does not currently
2 have any loans and is unaware of any documents that would be responsive to this request.

3 **REQUEST FOR PRODUCTION NO. 4:**

4 Please produce those portions of any diary, journal, calendar, or similar record kept by
5 BBC or its officers/corporate representatives during the last five (5) years that refer to or relate to
6 the creation of, selection of, and use of the names “bok a bok”, “BOK BOK” or “BOCBOC
7 Chicken Delight”.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 4:**

9 BBC incorporates each of the General Objections in this response as though they were set
10 forth in full herein. BBC also further objects to this Request as vague, ambiguous, unduly
11 burdensome and/or overbroad. “BOCBOC Chicken Delight” is interpreted by BBC to be
12 BOCBOC Chicken Delight. BBC also further objects to this Request as the request seeks
13 documents and things that are Confidential in nature and can only be disclosed after the entry of a
14 protective order protecting certain documents as Attorney’s Eyes Only and/or confidential. BBC
15 further objects to the compound nature of the Request regarding the three different marks. BBC
16 has never used the “bok a bok” name and therefore such documents cannot exist. BBC further
17 objects that the Request seek documents, information, and things (a) not relevant to the subject
18 matter of this investigation, (b) not reasonably calculated to lead to the discovery of admissible
19 evidence, or (c) otherwise not within the scope of relevant discovery.

20 BBC offers to meet and confer with Defendants in an attempt to resolve these objections
21 at a mutually convenient date and time.

22 BBC expressly reserves the right to supplement and/or amend this response as its
23 investigation continues and as further information becomes available.

1
2 **REQUEST FOR PRODUCTION NO. 5:**

3 Produce all documents that you believe supports your response to the preceding
4 interrogatory regarding damages.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 5:**

6 BBC incorporates each of the General Objections in this response as though they were set
7 forth in full herein. BBC also further objects to this Request as vague, ambiguous, unduly
8 burdensome and/or overbroad. BBC further objects to the requests to the extent they seek
9 documents and things relating to BBC's claims and defenses at this time and are thereby
10 premature. BBC also further objects to this Request as the request seeks documents and things
11 that are Confidential in nature and can only be disclosed after the entry of a protective order
12 protecting certain documents as Attorney's Eyes Only and/or confidential.

13 BBC offers to meet and confer with Defendants in an attempt to resolve these objections
14 at a mutually convenient date and time.

16 BBC expressly reserves the right to supplement and/or amend this response as its
17 investigation continues and as further information becomes available.

18 **REQUEST FOR PRODUCTION NO. 6:**

19 Please produce documents that reflect confusion between the marks bok a bok,
20 BOKBOK, and/or BOCBOC Chicken Delight.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 6:**

22 BBC incorporates each of the General Objections in this response as though they were set
23 forth in full herein. BBC also further objects to this Request as vague, ambiguous, unduly
24 burdensome and/or overbroad. BBC further objects to the requests to the extent they seek

1 documents and things relating to BBC's claims and defenses at this time and are thereby
2 premature. BBC also further objects to this Request as the request seeks documents and things
3 that are Confidential in nature and can only be disclosed after the entry of a protective order
4 protecting certain documents as Attorney's Eyes Only and/or confidential. BBC objects to the
5 request to the extent they seek documents and things that are equally or more readily available to
6 Defendants such as Defendants' purported evidence of confusion and Mr. Prindle's April 2018
7 letter to Plaintiff.

8 BBC offers to meet and confer with Defendants in an attempt to resolve these objections
9 at a mutually convenient date and time.

10 BBC expressly reserves the right to supplement and/or amend this response as its
11 investigation continues and as further information becomes available.
12

13 **REQUEST FOR PRODUCTION NO. 7:**

14 Other than documents containing attorney-client privileged or work product information,
15 produce all documents that you possess related to your claimed right to use the name BOKBOK
16 and or BOCBOC Chicken Delight.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 7:**

18 BBC incorporates each of the General Objections in this response as though they were set
19 forth in full herein. BBC further objects to the requests to the extent they seek documents and
20 things relating to BBC's claims and defenses at this time and are thereby premature. BBC also
21 further objects to this Request as the request seeks documents and things that are Confidential in
22 nature and can only be disclosed after the entry of a protective order protecting certain
23

1 documents as Attorney's Eyes Only and/or confidential. BBC offers to meet and confer with
2 Defendants in an attempt to resolve these objections at a mutually convenient date and time.

3 BBC expressly reserves the right to supplement and/or amend this response as its
4 investigation continues and as further information becomes available.

5 **REQUEST FOR PRODUCTION NO. 8:**

6 Produce all statements identified in the prior Interrogatory [Interrogatory NO. 5]

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 8:**

8 BBC incorporates each of the General Objections in this response as though they were set
9 forth in full herein. Further subject to the answer and objections provided in the Response to
10 Interrogatory No. 5, BBC does not believe that any documents currently exist responsive to this
11 Request.

12 BBC expressly reserves the right to supplement and/or amend this response as its
13 investigation continues and as further information becomes available.

14 **REQUEST FOR PRODUCTION NO. 9:**

15 Please produce documents in your possession that support your answer to the preceding
16 Interrogatory [No.6].

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 9:**

18 BBC incorporates each of the General Objections in this response as though they were set
19 forth in full herein. Further subject to the answer and objections provided in the Response to
20 Interrogatory No. 6, BBC does not believe that any documents currently exist responsive to this
21 Request. Communication regarding creation, selection, and use were internal discussions within
22 BBC.

1
2 BBC expressly reserves the right to supplement and/or amend this response as its
3 investigation continues and as further information becomes available.

4 **REQUEST FOR PRODUCTION NO. 10:**

5 Produce all evidence, other than the assignment contract, that reflects that BOKBOK in
6 Nevada received any goodwill from the restaurant BOCBOC Chicken Delight in New York.

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 10:**

8 BBC incorporates each of the General Objections in this response as though they were set
9 forth in full herein. BBC also further objects to this Request as vague, ambiguous, unduly
10 burdensome and/or overbroad. BBC also further objects to this Request as the request seeks
11 documents and things that are Confidential in nature and can only be disclosed after the entry of
12 a protective order protecting certain documents as Attorney's Eyes Only and/or confidential.

13 BBC offers to meet and confer with Defendants in an attempt to resolve these objections
14 at a mutually convenient date and time.

16 BBC expressly reserves the right to supplement and/or amend this response as its
17 investigation continues and as further information becomes available.

18 **REQUEST FOR PRODUCTION NO. 11:**

19 Please produce all documents exchanged between BBC and/or its attorneys and Guang-
20 Yang Li and/or his Attorneys.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 11:**

22 BBC incorporates each of the General Objections in this response as though they were set
23 forth in full herein. BBC also further objects to this Request as vague, ambiguous, unduly
24 burdensome and/or overbroad. BBC also further objects to this Request as the request seeks

1 documents and things subject to a claim of confidentiality from a third party and/or confidential
2 in nature and can only be disclosed after the entry of a protective order protecting certain
3 documents as Attorney's Eyes Only and/or confidential.

4 BBC further objects to this Request because this Request is so broadly worded that it
5 requests information that is covered under the attorney client privilege or under the attorney
6 work-product exception.

7 BBC offers to meet and confer with Defendants in an attempt to resolve these objections at a
8 mutually convenient date and time.

9 BBC expressly reserves the right to supplement and/or amend this response as its
10 investigation continues and as further information becomes available.

12 DATED this 3rd day of December, 2018.
13

14 Respectfully submitted,

15 By: /S/ Joe Chalverus
16 Joseph Chalverus
17 /S/ Tracy Heims
18 /S/ Lynette Wylie
19 APEX JURIS PLLC
20 12733 Lake City Way NE
21 Seattle, WA 98125
22 Tel.: (206) 664-0314

23 /S/Nihat Deniz Bayramoglu (pro hac vice)
24 Nihat Deniz Bayramoglu
25 Bayramoglu Law Offices LLC
1540 West Warm Springs Road
Henderson, NV 89014
Tel: (702) 462-5973
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I, hereby certify, that, on December 3rd, 2018, I caused the foregoing document to be served by the method indicated below on the parties listed below:

Joseph Chalverus
Tracy Heims
Lynette Wylie
APEX JURIS PLLC
12733 Lake City Way NE
Seattle, WA 98125
Tel.: (206) 664-0314
chalveruslaw@gmail.com
lynnette@apexjuris.com
tracy@apexjuris.com

- Hand delivery
- Facsimile transmission
- overnight delivery
- Regular US Mail
- Email Delivery

Attorneys for Plaintiff

Kathryn Childers
Joel E. Wright
Marc Rosenburg
Gregory P. Turner
LEE SMART P.S. Inc.
1800 One Convention Street
701 Pike Street
Seattle, Washington 98101

- Hand delivery
- Facsimile transmission
- overnight delivery
- Regula US Mail
- Email Delivery

Attorneys for Defendants

I am not a party to nor interested in the action and I am over the age of eighteen (18) years.

DATED this 3rd day of December, 2018.

/S/ Alecia Smith
Alecia Smith
Bayramoglu Law Offices LLC
1540 West Warm Springs Road Suite 100
Henderson, NV 89014
702 462 5973

Attorneys for Plaintiff